

Joint Status Report Pursuant to Rule 26(f)Caption: Lesly Flores v. Saint Joseph's UniversityCivil Action No: 2:25-cv-01738-MSGBasis of Jurisdiction: 28 U.S. Code § 1331 - Federal questionJury Trial: X Non-Jury Trial: _____ Arbitration: _____Plaintiff's counsel participating in the Rule 16 Conference: Albert J. Michell, Esq.Defendant's counsel participating in the Rule 16 Conference: Chelsea L. Hollenstein, Esq.Do counsel have full authority to settle at Rule 16 Conference? Yes.

If not, client with such authority who will attend conference: _____

When did the parties hold the Rule 26 Conference? June 16, 2025When did the parties comply with Rule 26(a)'s duty of self-executing disclosure? June 30, 2025Does either side expect to file a case-dispositive motion? Yes. (yes/ no)

Defendant preserves its ability to file a motion for summary judgment under Rule 56 of the Federal Rules of Civil Procedure.

If yes, under what Rule _____ Defendant preserves its ability to move for summary judgment with respect to all claims set forth in Plaintiff's Complaint.

Proposed deadline for filing dispositive motions: Within thirty (30) days after the close of fact discovery.Does either side anticipate the use of experts? Plaintiff wishes to retain the option to call upon a mental health professional.If yes, what is the proposed deadline for expert discovery? One month after fact discovery: November 14, 2025.Approximate date case should be trial-ready: Within sixty (60) days after the Court issues a ruling on Defendant's motion for summary judgment.Time for Plaintiff's case: Two (2) Days Time for Defendant's case: Two (2) to Three (3) DaysIs a settlement conference likely to be helpful? Yes. If so, when:Early No (yes/ no) After Discovery Yes (yes/ no)

What is the outcome of your discussions with your clients about proceeding before a

Magistrate Judge for final disposition? The parties do not agree to proceed before a Magistrate Judge for final disposition

Plan for Discovery:

1. The parties anticipate that discovery should be completed within 120 days.
2. What is the minimum amount of time necessary to complete discovery prior to an ADR session, should one be ordered or agreed to? 90 days
3. Have the parties discussed issues relating to claims of privilege or of protection as trial-preparation material, as required by Rule 26(f)(3)(D)? yes
4. Identify any other discovery issues which should be addressed at the Rule 16 Conference, including limitations on discovery, protective Orders needed, or other elements which should be included in a particularized discovery plan.
None known. Plaintiff reserves the right to retain the option to call an expert mental health professional for emotional distress damages.
5. If you contend the discovery period should exceed 90 days, please state reason:
N/A at this time.

This form should be filed on ECF